

REMARKS

This is intended as a full and complete response to the Office Action dated August 9, 2005, having a shortened statutory period for response set to expire on November 9, 2005. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-22 are rejected by the Examiner. Claims 1, 5-18, and 23-34 remain pending in the application after entry of this response. Claims 1, 5-8, 10, 13, and 18 have been amended and new claims 23-34 have been added. No new matter has been added by either the amendments or new claims. Claims 2-4 and 19-22 have been canceled without prejudice. Reconsideration of the rejected claims is requested for reasons presented below.

Information Disclosure Statement

The Examiner notes that all of the references cited in the international search report (ISR) submitted with the supplemental information disclosure statement (IDS) mailed March 31, 2005 were not listed in the SIDS. However, the omitted references were submitted in a first electronic IDS filed July 6, 2004. Note, the first IDS appears in PAIR both in the Transaction History and the Image File Wrapper. The first IDS does not appear to have been considered by the Examiner. For the Examiner's convenience, Applicants are resubmitting the first IDS in paper form, minus the reference already cited by the Examiner, with this response.

Claim Rejections – 35 USC § 102

Claims 1-3, 8, 10-13 and 16-22 stand rejected under 35 U.S.C. 102(b) as being anticipated by *Coon* (5,309,993). Claims 2, 3, and 19-22 have been canceled.

Coon does not teach, suggest, or disclose a seal assembly "wherein the length of the adapter is substantially the same or greater than the length of the sleeve flow port," as recited in claim 1. *Coon* also does not teach, suggest, or disclose a seal assembly, wherein either "the length of one of the adapters is substantially the same or greater than the length of a sleeve flow port of the wellbore tool" or "wherein the length of one of

the adapters is greater than the combined length of the rest of the seal assembly,” as recited in claim 13. Therefore, claims 1 and 13 are patentable over *Coon*. Claims 8, 10, 11, 12, and 23-27; and 16-18 and 28-34 are also patentable over *Coon* since they depend from claims 1 and 13, respectively.

Claims 13-15 are rejected under 35 U.S.C. 102(b) as being anticipated by *Baugh* (5,611,547). *Baugh* does not teach, suggest, or disclose a sealing assembly comprising two substantially chevron-shaped sealing elements having opposite axial orientations and “at least one of wherein the length of one of the adapters is substantially the same or greater than the length of a sleeve flow port of the wellbore tool, and wherein the length of one of the adapters is greater than the combined length of the rest of the seal assembly,” as recited in claim 13. The prior art design illustrated in Fig. 1 of *Baugh* does not satisfy either of the length requirements of claim 13 and *Baugh*’s two embodiments illustrated in Figs. 2 and 3, respectively, do not disclose two substantially chevron-shaped sealing elements having opposite axial orientations. Therefore, claim 13 is patentable over *Baugh*. Claims 14, 15, and 28-34 are also patentable over *Baugh* since they depend from claim 13.

Claim Rejections – 35 USC § 103

Claims 4-7 and 9 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Coon* in view of *Baugh*. Claims 4 and 9 have been canceled.

Regarding claims 1, 5-7, 9, and 23-26, *Coon* and *Baugh*, either alone or in combination, do not teach, suggest, or disclose a seal assembly “wherein the length of the adapter is substantially the same or greater than the length of the sleeve flow port,” as recited in claim 1. As discussed above, *Coon* does not teach, suggest, or disclose a seal assembly satisfying the length requirements of claim 1. *Baugh* does not teach, suggest, or disclose any of the limitations of claim 1. *Baugh* discloses a seal assembly between a mandrel 10 and a liner 50. The seal assembly is secured to the mandrel 10 (which is disposed at the end of production tubing) by stop rings and installed into a lined bore. The seal assembly provides a seal between the mandrel and the liner. *Baugh* is concerned about the effects of well fluid in the well impacting the seal assembly upon insertion of the seal assembly into the lined bore. *Baugh* never

discloses that either the mandrel 10 or the liner 50 have a flow port, much less both of them. Thus, *Baugh* cannot disclose that the length of any part of the seal assembly is related to a flow port in the mandrel 10 (or the even a flow port in the liner 50 or even any flow port for that matter). Therefore, claim 1 is patentable over *Coon* in view of *Baugh*. Claims 5-7, 9, and 23-27 are also patentable over *Coon* in view of *Baugh* since they depend from claim 1.

Regarding claims 28-34, as discussed above, *Coon* does not teach, suggest, or disclose a seal assembly satisfying the length requirements of claim 13. Also as discussed above (neglecting the prior art Fig. 1), *Baugh* does not teach, suggest, or disclose a seal assembly, comprising two substantially chevron-shaped sealing elements having opposite axial orientations. *Baugh's* primary teaching teaches away from a combination with *Coon*. *Baugh* is primarily concerned with the lack of rigidity of a chevron element having wings facing against the direction of flow. Due to the lack of rigidity, the outer wing(s) will actually bend backwards upon insertion of *Baugh's* mandrel into a lined bore. To correct this, *Baugh* replaces the prior art chevron stack (preferably both of them) facing against the flow with a single integral piece having a chevron end portion (or both stacks with a single piece having two chevron end portions). As elaborated by *Baugh*:

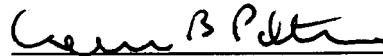
Where the problem in the past has occurred is to try to advance the chevron section 84 which is downwardly oriented on upper element 82 into that same bore 50. While past designs employing stacks of thin, chevron elements have resulted in counter-clockwise deflection of outer wings in downwardly oriented chevron sections of the prior designs, the present design incorporates a unitary structure having significant, overall longitudinal length connected to a chevron section 84, as compared to its thickness (preferably a ratio of about 10:1). As a result, outer wing 86 has sufficient structural strength to displace fluid present around O-ring 78 and to get into bore 50 without adverse counter-clockwise displacement which would, in effect, bend back outer wing 86 and diminish the ability of upper seal 82 to seal against differential pressures where the downhole pressure exceeded the uphole pressure on the seal.

(Col. 4, line 55-col. 5, line 4.) Thus, *Baugh's* primary teaching is clearly in conflict with *Coon's* design employing Chevron stacks. Therefore, claim 13 is patentable over *Coon* in view of *Baugh*. Claims 28-34 are also patentable over *Coon* in view of *Baugh* since they depend from claim 13.

Conclusion

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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